



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1201 ELM STREET, SUITE 4500
DALLAS, TX 75270

DATE: February 7, 2020

PREPARED BY: Special Agent (b) (6), (b) (7)(C)

CASE #: OI-DA-2014-CAC-0016

CROSS REFERENCE #: 2013-209

TITLE: A4 SCIENTIFIC

FINAL SUMMARY REPORT

Subject(s)	Location	Other Data
A4 Scientific	(b) (6), (b) (7)(C) The Woodlands, Texas 77380	

VIOLATION(S):

The potential violations are but not limited to 18 U.S.C. 1001 (False Statements); 18 USC 287 (False Claims) ; 18 U.S.C. 1341 Mail Fraud; and 18 U.S.C. 1343 (Wire Fraud).

ALLEGATION:

On September 30, 2013, a complaint was initiated by former Special Agent (b) (6), (b) (7)(C), U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), Office of Investigations (OI), based upon information received from (b) (6), (b) (7)(C) identified potential laboratory fraud resulting from inappropriate manual integrations.

On November 14, 2013, Hotline Complaint 2014-014 was initiated based upon information received from (b) (6), (b) (7)(C) advised inappropriate manual integrations were performed by an A4 Scientific (A4) lab analyst (b) (6), (b) (7)(C).

FINDINGS:

The CLP program is a direct contractual program with EPA for laboratories to provide data analyses on samples from various superfund sites.

A review of the EPA financial systems determined for the calendar years 2008-2014, the total payments the EPA made to the A4 was \$7,098,301.58.

RESTRICTED INFORMATION

Page 1

This report is the property of the Office of Investigations and is loaned to your agency: it and its contents may not be reproduced without written permission. The report is FOR OFFICIAL USE ONLY and its disclosure to unauthorized persons is prohibited. Public availability to be determined under 5 U.S.C. 552.

On November 21, 2013, (b) (6), (b) (7)(C) EPA, OIG, OI, conducted a telephonic interview with (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) identified numerous violations of the A4 Quality Assurance Plan, as well as issues pertaining to analysis dates, extraction dates, and sample receipt dates. (b) (6), (b) (7)(C) approximately 4,487 samples results were potentially affected by the actions taken at A4.

On November 21, 2013, (b) (6), (b) (7)(C) conducted a telephonic interview with (b) (6), (b) (7)(C). During a review of data provided by A4, (b) (6), (b) (7)(C) noted flags indicating manual integrations were performed on quality control sample analyses rendering results, which were very close to limits contained in the contract requirements. (b) (6), (b) (7)(C)

Upon review of the electronic data files, (b) (6), (b) (7)(C) noted numerous inappropriate manual integrations (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)

A Review of the electronic files revealed numerous deficiencies including, inappropriate manual integrations, inaccurate extraction dates, inaccurate analyses dates, and lack of quality control checks. (b) (6), (b) (7)(C) conducted a review of A4's Quality Assurance Plan. (b) (6), (b) (7)(C) noted numerous areas where A4 failed to follow their own rules and procedures.

On February 24, 2014, (b) (6), (b) (7)(C) coordinated with (b) (6), (b) (7)(C) Assistant United States Attorney (AUSA), Southern District of Texas, Houston, Texas, with the support of (b) (6), (b) (7)(C) EPA OIG, to (b) (7)(E) AUSA (b) (6), (b) (7)(C) advised based upon information provided, (b) (6), (b) (7)(C), (b) (7)(E)

On April 3, 2014, (b) (6), (b) (7)(C), EPA, created a termination for default to A4 for contract EP-W-10-018, which became effective April 7, 2014.

Effective October 2, 2014, A4 was placed in an "ineligible" status in the System for Award Management (SAM). This indicates A4 was suspended from Government contracting indefinitely pending the outcome of the investigation.

Effective October 2, 2014, (b) (6), (b) (7)(C), A4, was placed in an "ineligible" status in the SAM. This indicates (b) (6), (b) (7)(C) was suspended from Government contracting indefinitely pending the outcome of the investigation.

A recent review of the SAM revealed on November 4, 2015, both A4 and (b) (6), (b) (7)(C) suspension ended.

On August 1, 2019, SA (b) (6), (b) (7)(C) contacted (b) (6), (b) (7)(C) S&D, EPA, to determine if SA (b) (6), (b) (7)(C) had spoken with S&D regarding the current investigative findings. (b) (6), (b) (7)(C) stated

S&D had not been briefed on the current investigative findings. (b) (6), (b) (7)(C) advised SA (b) (6), (b) (7)(C) to contact (b) (6), (b) (7)(C) S&D.

DISPOSITION:

On December 20, 2013, SA (b) (6), (b) (7)(C) contacted Assistant United States Attorney (AUSA) (b) (6), (b) (7)(C) Affirmative Civil Enforcement, Northern District of Texas, Fort Worth, Texas, and presented the findings to date with regard to fraudulent manipulation of laboratory calibration standards resulting in submission of false certifications and false claims to EPA. (b) (6), (b) (7)(C) stated he would open a case on this matter (b) (5), (b) (7)(E).

(b) (6), (b) (7)(C), (b) (5), (b) (7)(E)

On January 28, 2020, SA (b) (6), (b) (7)(C) spoke with AUSA (b) (6), (b) (7)(C) regarding a tolling agreement and repayment from (b) (6), (b) (7)(C) or A4. AUSA (b) (6), (b) (7)(C) stated it does not appear (b) (6), (b) (7)(C) or A4 has the ability to make any payments to the EPA. Nor is (b) (6), (b) (7)(C) or A4 receiving EPA funds or currently in operation. AUSA (b) (6), (b) (7)(C) declined the case. This case is being closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVENUE NW
WASHINGTON, DC 20004

DATE: December 9, 2019

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2018-ADM-0079

CROSS REFERENCE

TITLE (b) (6), (b) (7)(C) SES, (b) (6), (b) (7)(C)

CASE CLOSING REPORT

Subject(s)	Location	Other Data
(b) (6), (b) (7)(C) (b) (6), (b) (7)(C)	Washington, DC	

VIOLATIONS: 5 U.S.C § 2302(b)(2) – Prohibited Personnel Practices

ALLEGATION: On March 8, 2018 and March 9, 2018 respectively, the Washington Field Office, Office of Investigation, Office of Inspector General, Environmental Protection Agency (EPA) received information from two anonymous sources concerning an allegation of prohibited personnel practices by EPA management. The sources reported (b) (6), (b) (7)(C), (b) (7)(D) [REDACTED], interfered in the hiring process of a new law enforcement applicant (b) (6), (b) (7)(C), (b) (7)(D) [REDACTED]

FINDINGS: The results of the investigation showed that (b) (6), (b) (7)(C) involvement in the hiring of (b) (6), (b) (7)(C) was a result of a request (b) (6), (b) (7)(C) received from (b) (6), (b) (7)(C) [REDACTED]. In an e-mail message sent to (b) (6), (b) (7)(C) recommended (b) (6), (b) (7)(C) for employment, and subsequently, (b) (6), (b) (7)(C) hired (b) (6), (b) (7)(C). After completing all logical investigative steps, the results of this investigation as it relates to the allegation are inconclusive. This matter was declined by the United States Attorney's Office on October 29, 2018.

DISPOSITION: No further investigative action is warranted. This investigation is hereby closed.

RESTRICTED INFORMATION

Page 1

This report is the property of the Office of Investigations and is loaned to your agency: it and its contents may not be reproduced without written permission. The report is FOR OFFICIAL USE ONLY and its disclosure to unauthorized persons is prohibited. Public availability to be determined under 5 U.S.C. 552.